
Modern Slavery Statement

2024/2025

Version 6.0





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Introduction

The ILO's Global Estimates¹ indicates that in 2021:

- there were 50 million people in situations of modern slavery on any given day; and
- of all adults in forced labour exploitation, 2.6 million people (or overall 16%), were in the construction industry. Many cases involve migrant workers whose situations of forced labour stem from extortionate recruitment fees and other fraudulent recruitment practices of unscrupulous labour intermediaries.

Significantly, at least 22% of forced labour victims are found in the manufacture and production of raw materials including in forestry, mining and quarrying – key suppliers for property and construction.²

According to a report in 2018 by the UK Chartered Institute of Building, modern slavery was recorded to generate approximately \$150 billion USD per year worldwide, with this figure likely increasing over the past seven years. Focusing on the global construction industry approximately \$34 billion USD of the estimated amount comes from the construction, manufacturing, mining, and utilities industries.

The 2018 Modern Slavery Review undertaken by the Australian Government singled out three key points which were highlighted as the targets for legislative change. These included an improvement in the standard of modern slavery reporting, enforcing the reporting obligations of entities and addressing incompatible Modern Slavery Statements.

As the Global Slavery Index categorises Australia as low risk for modern slavery, Roberts Co considers that it is likely to have a low risk of modern slavery practices in its permanent workforce⁵. Roberts Co is aware that there is a greater risk of modern slavery that exists in its supply chains, rather than its permanent workforce. Roberts Co's goal is to eliminate modern slavery in its operations and supply chains. Achieving our goal continues to be a multi-year project and requires all of us to work together to protect the rights of the world's most vulnerable people.

¹ ILO Global Estimates of Modern Slavery - Forced Labour and Forced Marriage September 2022

<https://www.ilo.org/publications/major-publications/global-estimates-modern-slavery-forced-labour-and-forced-marriage>

² Australian Human Rights Commission and KPMG, "Property, Construction & Modern Slavery" 2020

<https://assets.kpmg.com/content/dam/kpmgsites/au/pdf/2020/property-construction-modern-slavery-practical-guide.pdf>

³ The Chartered Institute of Building, "Construction and the Modern Slavery Act" 2018

<https://www.ciob.org/industry/research/State-of-Well-being-Construction-Industry>

⁴ Australian Government Attorney-General's Department, Report of the Statutory Review of the Modern Slavery Act 2018 (Cth)

<https://www.ag.gov.au/crime/publications/report-statutory-review-modern-slavery-act-2018-cth>

⁵ Walk Free 2023, The Global Slavery Index 2023, <https://walkfree.org/global-slavery-index/>

02 |

About us

This Modern Slavery Statement is made by Roberts Australia Holdings Pty Ltd ABN 76 686 362 550 for the year ended 31 December 2025 (FY25) pursuant to the Modern Slavery Act 2018 (Cth) (Modern Slavery Act).

Roberts Co is a privately held company committed to driving positive change in the Australian construction industry. It operates in within Australia via its wholly owned subsidiaries, Roberts Co (NSW) Pty Ltd, Roberts Co (QLD) Pty Ltd, Roberts Co Residential Pty Ltd, R A National Management Services Pty Ltd, Roberts Co Management NSW Pty Ltd and R A Finance Company Pty Ltd. Roberts Australia Holdings Pty Ltd has consulted and considered each of its subsidiaries in the development of this Modern Slavery Statement. When we refer to "Roberts Co", "we" "us" or "our" in this statement, it is a reference to the Roberts Australia Holdings Pty Ltd and its wholly owned subsidiaries.

Our values

We exist to do good, not just make good.
To look forward. To innovate.
To push. To lead. To change.

We recognise the inherent dignity of all people and the importance of respecting and promoting human rights, including the rights of our employees, suppliers and the communities in areas where we operate.

We also expect our suppliers and contractors to respect and promote human rights and encourage any joint ventures to adopt a similar approach.

Our approach to assessing and addressing modern slavery, as well as broader human rights, continues to be guided by the United Nations Guiding Principles on Business and Human Rights (UNGP). In keeping with our hallmark ambitions underpinned by "how we interact with and care for our people, industry partners and the community" and our desire to "drive change in the Australian construction sector", Roberts Co is committed to adopting industry best practices and standards as part of the global efforts to eradicate modern slavery.

Our values are an expression of what is important to us. Consideration of human rights and modern slavery is integral to our broader commitment to diversity, inclusion, wellbeing and aligns strongly with our organisational values shown:



Empowered People

Strong leadership is in place at Roberts Co, but our flat structure gives everyone a voice. We believe in empowering our team to be the best they can be - exceptional ideas are encouraged and supported no matter who they come from.



Working Smarter

We're concerned with getting things done right and making a difference. We seek teams of diverse thinkers and pivot as needed to increase value and efficiency. We embrace technology and use it to improve our projects, our productivity and our work/life balance.



Relationship Driven

We build relationships as well as projects, fostering true partnerships that stand the test of time. We respect the expertise of our colleagues, clients, subcontractors and consultants because we know it takes a team to build a project.



Creating Value

We take our work personally and will always offer design smarts to enhance our clients' results. We're creative thinkers and problem solvers, determined to deliver solutions, not excuses

Our structure

Roberts Co is a tier-one construction company delivering design and construction services.

We have three teams in our operations, namely:



1.0 New business



2.0 Project delivery and design



3.0 Corporate services

The registered office for all Roberts Co companies is Level 9, 60 Castlereagh St, Sydney NSW 2000

Our operations

During 2025, Roberts Co employed 97 personnel and had 10 active projects.

Staff Total	97
Office staff	70
Site based staff (including apprentices and trainees)	21
Fixed term	4
Contractors	2

Construction, processing and production

As a tier one contractor, Roberts Co has delivered work for both private and government clients inclusive of commercial, education, residential, health, pharma and hospitality. Roberts Co assists its clients to provide professional consultancy, design, engineering, environmental, assurance, project and cost management services in the construction sector. Our teams comprise of project managers, engineers/coordinators, commercial managers, supervisors and HSE professionals who help our clients achieve success through all stages of a project lifecycle, from the design and consultation of projects, through to the design, delivery and asset management.

See overleaf section on "Our Projects" for a list of Roberts Co projects in 2025.

Our projects

During 2025 we worked on the following key projects:



01

The Children's Hospital at Westmead Stage 2 – PSB

The PSB is a high-rise state-of-art paediatric hospital consisting of new front and back of house facilities; PICU; NICU; inpatient units and family focused retreat areas.



04

HOME Parramatta Completion

A 47 storey Build to Rent tower comprising 428 purpose built dwellings geared towards permanent renters.



02

Carlingford & Cumberland Schools Package

The package involves the delivery of new buildings and refurbishment works for the Carlingford West Public School and Cumberland High School.



05

The Macquarie

The project involves the demolition of the Sir Stamford Hotel and construction of a new 16 Storey ultra-luxury apartment tower. The project will also include a full restoration and refurbishment of the adjoining Health Building into a premium dining and leisure venue.



03

Cumberland West Mental Health Services Relocation Early Works

Early works package encompassing critical enabling works to prepare the site for the delivery of a new purpose-built mental health complex.



06

Castle Hill

This new residential address brings 340 new apartments together with abundant health and wellness amenity, timeless architecture, natural serenity, and modern convenience.



09

Canterbury

A landmark mixed-use project set to transform a key site in Sydney's Inner West. Rising 38 storeys, it will deliver 402 thoughtfully designed apartments alongside 9,000 square metres of commercial and retail space, creating a vibrant new destination for living, working, and gathering..



07

Campsie, Beamish

Delivering 351 apartments in the heart of Campsie, bringing new life to one of Sydney's most diverse and well-connected neighbourhoods. The project combines intelligent design, quality finishes, and seamless access to the new Campsie Metro station just moments away..



10

Sunset Residences

A first project win in Queensland for Roberts Co - Sunset Residences is a riverfront, design-driven tower set to elevate one of Surfers Paradise's most rapidly transforming enclaves. The refined scheme, designed by Plus Studio, features 72 luxury residences, enhanced amenity, and improved connectivity to the Nerang River.



08

Campsie, London

London Street project will deliver 150 apartments across 29 storeys, rising above a new health and wellness precinct. Located near the new Metro station, combining elevated living with over 3,000m² of curated retail and commercial space.



Our supply chain

In 2025, Roberts Co’s procurement spend was approximately \$260m. The main categories of spend from our project teams and corporate services team remain largely unchanged from year to year. An overview of the categories is set out below.

Of the above, our top spends categories were: subcontractors, labour and materials.



Project teams

Items denoted with * are manufactured overseas

Subcontractors, labour and materials

- Construction survey
- Traffic control
- Masonry works
- Painting
- Turntable
- Electrical security comms services
- Fire protection services
- Hydraulic services
- Lift services
- Mechanical and BMS services
- Demolition / earthworks
- Reinforcement fix
- Construction site cleaning
- Engineering
- Architectural services
- Labour hire
- Site security

- Waterproofing services
- Hoarding
- Scaffolding
- Access flooring
- Carpet and flooring
- Windows
- Metalwork
- Ceilings and partitions
- Green walls
- Air conditioning
- Electrical and data services
- Doors and frames
- Inter-tenancy stairs
- Concrete – supply and place
- Façade* such as glass, aluminium, terracotta, Fibre C, GRC and aluminium cladding

- Formwork
- Podium façade
- Post tensioning
- Tiles*
- Stone*
- Joinery*
- Steel*
- Concrete
- Reinforcement supply
- Pipes

Equipment

- Hoarding and jumpform signage
- Loading platforms
- People and materials hoists
- Rubbish bins
- Site sheds
- Tower crane
- Appliance



Finance, HR, legal, IT and insurance

- IT software
- IT equipment
- Merchandise
- Corporate travel and hospitality
- Catering
- Insurance broker and insurance services
- Advisory services, including professional services
- Training
- Recruitment
- Office supplies
- Office cleaning
- Utilities
- Rent

Our major sourcing regions were:

- Australia
- China
- South East Asia
- Europe

Most of our direct suppliers are domiciled in Australia, although they often supply goods or services sourced from other jurisdictions. Our subcontractors mostly supply the construction materials to be used on our projects, so this limits our visibility of the risks associated with these parts of our supply chain. Transport and logistics are also primarily acquired by our suppliers, subcontractors or their suppliers. We require and expect that our suppliers to comply with all applicable regulations and legislation relating to working hours, wages, welfare and human rights. We also include positive obligations to comply with applicable modern slavery practices in each of our supply chain contracts.

03 |

The risks of modern slavery in our operations and supply chain

The risk of modern slavery practices within our business were assessed on their potential to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains, as grounded in the human rights due diligence framework outlined in the UNGPs. Roberts Co considers there is a greater risk of modern slavery existing in its supply chains, particularly in jurisdictions outside of Australia, including third party labour hire providers as well as migrant workers.

In our operations

We recognise that modern slavery risks exist in Australia and are heightened in the construction sector. However, having regard to the following factors, the risk that we have caused or contributed to modern slavery in our operations remains low:

- ✔ Our executive leadership team continues to meet regularly to discuss business risk, which ensures that they have visibility of the risk of modern slavery in our operations and the controls adopted to manage those risks.
- ✔ We maintain strong human resources controls in place for onboarding new employees, reviewing employees' wages and salary agreements, and verifying corresponding payments. These form part of our Integrated Management Systems that control the processes within our businesses.
- ✔ Approximately 20% of employees are covered by enterprise or industrial agreements.
- ✔ Our employee on-boarding processes include working rights employment checks managed by our Human Resources function.
- ✔ Our employee induction processes also ensure that new employees confirm they have read and understood our policies and minimum standards.
- ✔ Human rights and Modern Slavery are part of our induction processes ensuring that everyone working on our projects has a basic awareness of the risks and ways to report.

In our supply chain

The selection of construction materials is often made by either the customer (where a particular material is specified, which can only be sourced from one supplier) or the subcontractor supplying labour and materials. It is difficult for a construction company such as ours to have visibility across the multiple tiers in the supply chain of the numerous components and raw materials that are used on all of our construction sites. However, as part of our due diligence efforts, we periodically review and assess our procurement data for modern slavery risks and endeavour to keep abreast of emerging or evolving risks relevant to the construction sector and ensure there are minimal direct links to modern slavery practices through our business relationships in the supply chain.

Materials and construction services, including labour hire are the main areas of higher risk in our business. Modern slavery risks can be exacerbated by a number of factors relevant to the construction sector, some of which are listed below:

- prevalence of outsourcing, which can impact upon operational and supply chain transparency
- contract terms with low margins and significant pressure on delivery times
- reliance on a migrant workforce with limited local language competency and temporary visa arrangements
- jurisdictional risk and industry risk in the supply of some construction materials
- multiple sub-contracting arrangements with informal agreements
- low barriers for entry for labour hire providers
- dangerous or substandard working conditions, including:
 - » workers are not paid fairly or withheld entitlements
 - » workers may be required to work excessive hours
 - » workplace safety concerns
 - » control of workers' freedom of movement or association
 - » withholding unreasonable fees for housing, transportation, food and other services

Debt bondage is one of the slavery-like practices that can occur in the construction sector where bonded labourers have to work to pay off debts that are often greater than the wages earned, resulting in an inability to leave. We are not aware of any instances of debt bondage at our sites.

The majority of our suppliers are domiciled in Australia. They predominantly provide labour and materials, as well as services. The materials used in the construction sector are often produced in countries where modern slavery is a greater risk, which means that modern slavery risks may exist in our supply chain well beyond the second or third tier across multiple procurement categories. The transport of these materials to Australia also creates modern slavery risk (noting that transport and logistics are inherently high risk for modern slavery). Roberts Co acknowledges that may it procure from high-risk countries and regions such as China, South East Asia and aspects of Europe.

This means that, although there is a lower risk that our business has caused or contributed to modern slavery, our connection to modern slavery exists via our supplier relationships and their respective supply chains.

We continue to consider the following construction categories as higher risk, consistent with prior years, due to inherent industry factors, including the potential use of higher risk components or raw materials and the possible involvement of vulnerable worker groups in the production process.

- Ceilings and partitions
- Podium façade
- Stones
- Tiles
- Steel
- Concrete
- PVC pipes
- Site sheds
- Scaffolding
- Demolition and earthworks
- Formwork
- Reinforcement fix
- Façade
- Masonry works
- Painting
- Doors and frames
- Loading platforms
- Hoists
- Rubbish bins
- Tower cranes
- Service plants and equipment

In addition to the risks associated with procurement in the construction sector, there are also modern slavery risks in the goods and services procured for our corporate services team. For example, there are inherent risks in production of the corporate merchandise and supplies we purchase as well as the IT hardware that we use day to day. We also recognise the modern slavery risks in the cleaning sector arising from exploitative labour practices.

¹¹ <https://shura.shu.ac.uk/30387/1/Murphy-BuiltOnRepression%28VoR%29.pdf>

04 |

Actions taken to assess and address the risks, including due diligence and remediation processes

We recognise our responsibility under the UNGPs to provide or participate in the remediation of any identified human rights impacts that we cause or contribute towards, and we understand that business can contribute or be directly linked to modern slavery practices.

Roberts Co identifies and manages modern slavery risks through a robust procurement framework. We have integrated additional modern slavery checks into our recruitment and onboarding processes for both employees and suppliers. These checks are embedded in our procurement approval tools, procedures, and documentation to ensure they are considered in all procurement decisions. We also review our Whistleblower Policy annually to confirm that modern slavery controls operate effectively within our compliance and whistleblower reporting processes.

During the Reporting Period, we did not identify any reporting linked to modern slavery. If we were to determine that our business had caused or contributed to modern slavery, we would follow the UNGP guidance and undertake remediation through a person-centred approach that prioritises the safety, privacy, and wellbeing of affected individuals. We would investigate the circumstances, implement an appropriate corrective action plan, and evaluate measures to prevent similar impacts in the future.

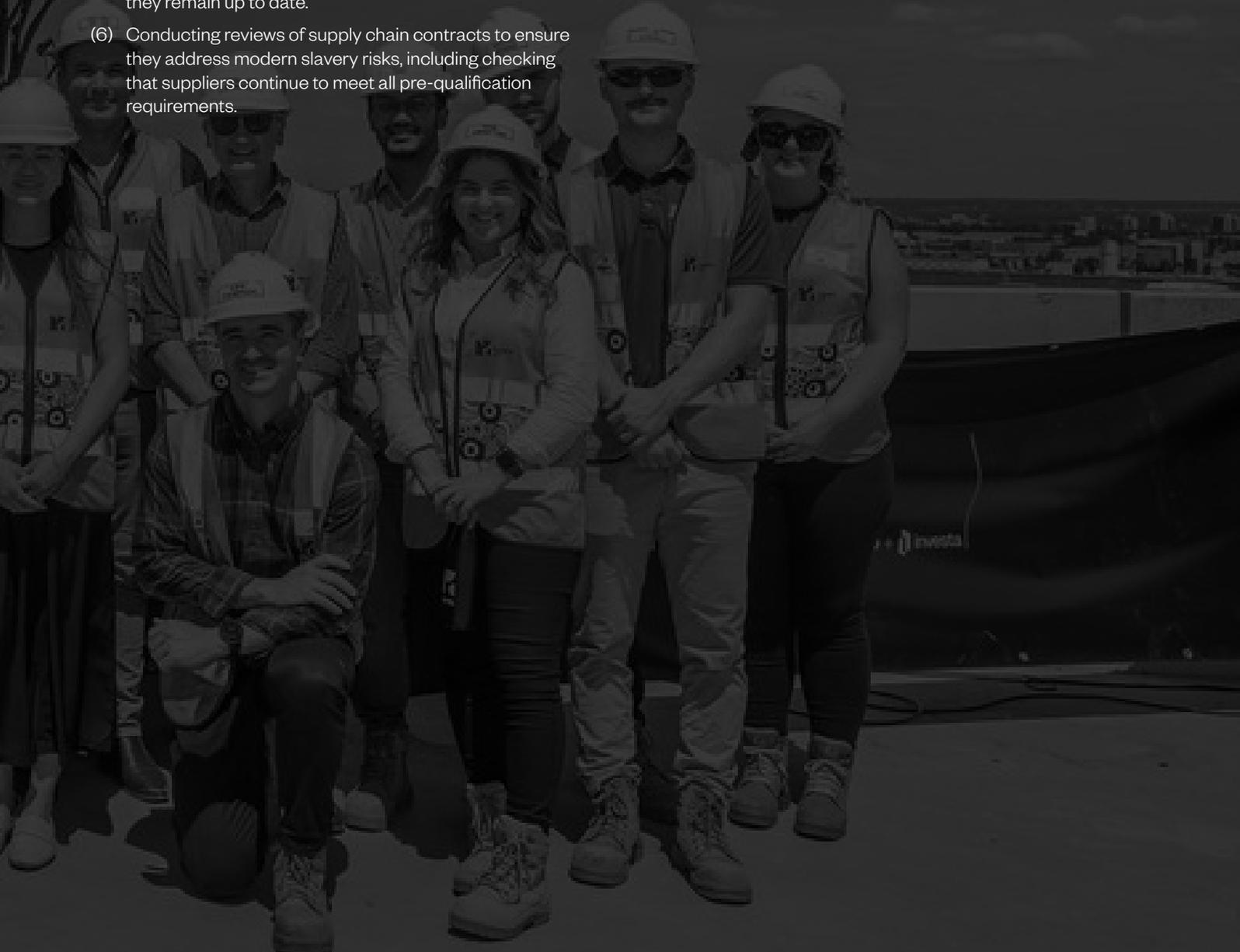
04 | Actions

Our work during FY25 built upon the goals set out in our FY24 statement. Our existing policies and procedures are described in Annexure A.

We progressed most of the goals that we set for ourselves in our FY24 statement to ensure that our approach to assessing and addressing modern slavery risks remains effective. In summary, the actions we have taken in FY25 are set out below:

- (1) Modern slavery training and awareness-raising programs were delivered for all Roberts Co staff;
- (2) 100% of complaints were resolved by a grievance mechanism;
- (3) All supply chain contracts have been updated to include modern slavery clauses; and
- (4) All employment contracts have been updated to include modern slavery clauses.
- (5) Regular checks of risk assessment processes to ensure they remain up to date.
- (6) Conducting reviews of supply chain contracts to ensure they address modern slavery risks, including checking that suppliers continue to meet all pre-qualification requirements.

Unsafe workplaces that impact worker rights can reflect modern slavery risk. We are committed to protecting the health and safety of all workers on our sites, including both our own employees and representatives of subcontractors and other staff. Protecting worker rights is a further means by which we manage modern slavery risk.



05 |

How we assess the effectiveness of our actions

Our approach to assessing the effectiveness of our program is underpinned by progressing a number of goals that we set for ourselves each year and setting new goals for the next reporting period.

Our work in this area is overseen by the CEO and the Board. As part of our ongoing efforts, we have expanded our metrics for assessing the effectiveness of our actions to include the following goals for FY26:



Continue to offer refresher training for Modern slavery awareness to all company staff



Continue to resolve 100% of complaints via the grievance mechanism



Continue to work with high-risk suppliers to improve their capacity to respond to modern slavery risks



Continue to review the Roberts Co Modern Slavery Policy to ensure it is integrated into Roberts Co's businesses appropriately.

06 |

Process of consultation

All of the reporting entities share Directors and report to the same executive team.

By its nature, the assessment and management of modern slavery risk requires the involvement of representatives of the corporate services teams, as well as the oversight of management. The individuals involved in the preparation of this statement were consulted in relation to all of the Roberts Co entities. These entities do not otherwise have owned or controlled entities that require consultation to prepare this statement. This statement reflects the work undertaken during the year of representatives of all of these teams within Roberts Co.

Roberts Co continues to engage in discussions with all stakeholders regarding modern slavery risks at future Board meetings. Roberts Co seeks the cooperation of all workers, suppliers and other parties working with our business. Roberts Co encourage suggestions for realising our modern slavery, equal opportunity and anti-discrimination objectives to create a safe, fair and tolerant working environment.



07 |

Approval

This statement for the financial year ending 31 December 2025 is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) and has been approved by the Board of Roberts Australia Holdings Pty Ltd, and its subsidiaries on 11/12/2025. This statement is signed by a responsible member of the Board of Roberts Australia Holdings Pty Ltd, the higher entity, as defined by the Act.

Signed,



George Kostas
Chief Executive Officer
11/12/2025



Statement Annexure

Mandatory criteria	Page number/s
Identify the reporting entity	2
Describe the reporting entity's structure, operations and supply chains.	2, 3, 4, 6, 7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	8, 9
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	10, 11
Describe how the reporting entity assesses the effectiveness of these actions.	12
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	13

Annexure A

-  Health and Safety Policy
-  Environmental Policy
-  Quality Policy
-  Drug and Alcohol Policy
-  Return to Work Policy
-  Industrial Relations Policy
-  Modern Slavery Policy
-  Whistleblower Policy

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